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Attorneys for Defendants

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

MICHIGAN LICENSED BEVERAGE
ASSOCIATION, a Michigan corporation

Case No. 2:12-cv-00611-JAD-BNW

Plaintiff,

**STIPULATION AND ORDER
FOR EXTENSION OF TIME TO RESPOND
TO (A) MOTION TO REOPEN CASE
AGAINST AREP, INC. AND DAVID
DOLINSKY AND ENFORCE CONSENT
DECREE AND (B) MOTION TO ENFORCE
CONSENT DECREE AND HOLD AREP
AND DAVID DOLINSKY IN CONTEMPT**

AREP, INC. d/b/a ACE BARTENDING ACADEMY, a Nevada corporation; and DAVID DOLINSKY, individually

(First Request) ECE No. 28

Defendants.

Pursuant to Local Rule IA 6-1(a), Plaintiff MICHIGAN LICENSED BEVERAGE ASSOCIATION (“Plaintiff”) and Defendants AREP, INC. and DAVID DOLINSKY (“Defendants”), by and through their undersigned counsel, hereby stipulate and agree to a 25-day extension of time up to and including Tuesday, March 31, 2020, for Defendants to respond to Plaintiff’s Motion to Reopen Case Against AREP, INC. and David Dolinsky and Enforce Consent Decree (ECF No. 23) and Plaintiff’s Motion to Enforce Consent Decree and Hold AREP and David Dolinsky In Contempt (ECF No. 24) (together, the “Motions”).

This is the first request for an extension of time for Defendants to respond to Plaintiff's Motions.

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1 This case has been closed since 2012. Back during that timeframe, Mr. Gile represented
2 AREP, Inc. in this case as an attorney with the law firm of Weide & Miller, Ltd. Even though
3 Mr. Gile left Weide & Miller in 2018, his name and current email address nonetheless remained
4 attached to the case as counsel of record.

5 Plaintiff's Motions were filed with the Court on February 19, 2020. At the time the
6 Motions were filed, Mr. Gile and his current law firm, Gile Law Group Ltd., had not been engaged
7 by AREP or Mr. Dolinsky to provide any form of legal services much less represent them in this
8 litigation. Mr. Dolinsky was served with copies of Plaintiff's Motion on February 21, 2020.
9 AREP and Mr. Dolinsky subsequently entered into an engagement agreement with Gile Law
10 Group Ltd. to provide them with legal representation in this case.

11 Good cause for this request exists because Defendants' counsel, now having been formally
12 engaged to represent both AREP and Mr. Dolinsky in this matter, requires additional time to
13 discuss the allegations in the Motion and the relevant facts related thereto with Defendants.
14 Defendants' counsel has also reached out to Plaintiff's counsel regarding possible settlement
15 terms and conditions and the additional time will also give the parties the opportunity to explore
16 if an early settlement is possible. Counsel for Defendants, therefore, requested a 25-day extension
17 to the present response deadline, to which counsel for Plaintiff graciously consented. For these
18 reasons, this stipulated request is made for good cause and not for purposes of delay.

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1 The parties stipulate that Defendants were served with the Motions on Friday, February
2 21, 2020, and that Defendants' response to the Motions are presently due on or before March 6,
3 2020. Through this Stipulation, Defendants will have up to and including March 31, 2020, to file
4 a response to Plaintiff's Motions.

5 **IT IS SO AGREED AND STIPULATED.**

6 **RESPECTFULLY SUBMITTED** this 2nd day of March, 2020.

7 **MCNUTT LAW FIRM, P.C.**

7 **GILE LAW GROUP LTD.**

8 *By: /s/ Dan McNutt*

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10 Matthew C. Wolf, Esq., Bar No. 10801
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8 *By: /s/ Ryan Gile*

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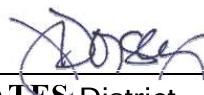
12 **TAFT STETTINIUS & HOLLISTER LLP**

13 Manuel "Manny" Herceg, Esq.*
13 Jonathan G. Polak, Esq.*
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14 Indianapolis, Indiana 46204
15 **Pro Hac Petitions Forthcoming*

16 *Attorneys for Defendants*

16 *Attorneys for Plaintiff*

17 **IT IS SO ORDERED:**

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20 UNITED STATES District

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20 JUDGE

21 DATED: 3-17-2020